

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-54-C

IN RE:

Petition of Verizon Communications,)	
Incorporated Requesting That the)	
Commission Require Frontier)	
Communications of the Carolinas,)	
Incorporated to Modify Its Tariff to)	PETITION TO INTERVENE
Correctly Reflect Application of Its)	
Interstate Switched Access Rates to)	
Originating, as well as Terminating,)	
VoIP-PSTN Access Minutes)	

Petitioner Sprint Communications Company, L.P. (“Sprint” or “Petitioner”), by its undersigned attorneys, hereby petitions the South Carolina Public Service Commission (the “Commission”), pursuant to Rule 103-825 of the Commission’s Rules, for an order allowing Sprint to intervene in the above Docket, with full rights to participate as a party of record. In support of its petition, Sprint would show the Commission the following:

1. On December 19, 2011, Frontier Communications of the Carolinas Inc. (“Frontier”) filed tariff revisions intended to reflect implementation of the intercarrier compensation regime for certain VoIP-PSTN traffic mandated (absent agreement by the affected companies) by the Federal Communications Commission (“FCC”) in its November 18, 2011 Report and Order and Further Notice of Proposed Rulemaking in WC Dockets No. 10-90, etc. (“Order”).

2. On January 31, 2012, Verizon Communications, Incorporated (“Verizon”) filed a petition requesting that the Commission require Frontier to modify its tariff to correctly reflect application of its interstate switched access rates to originating, as well as terminating, VoIP-PSTN Access Minutes. Frontier responded to this petition on February 22, 2012, urging the Commission to reject Verizon’s request. On February 24, 2012, Verizon responded to Frontier’s letter. On February 28, 2012, Frontier responded to the Verizon letter.

3. On February 29, 2012, the Commission issued a Directive, directing the Staff to set for hearing Verizon’s petition.

4. Sprint is an interexchange carrier authorized by the Commission to provide telecommunications in South Carolina. As a telecommunications carrier doing business in South Carolina, Sprint has an interest in the appropriate implementation of the Order, and seeks to participate in this Docket in order to protect and pursue its interests.

5. At this time, Sprint support’s Verizon’s position in this Docket. Of course, Sprint reserves the right to amend its position as the Docket progresses.

6. Petitioner should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.

7. Petitioner’s authorized representative in this proceeding is:

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
1501 Main Street, Suite 500
P.O. Box 2285
Columbia, SC 29202
(803) 343-1270
jpringle@ellislawhorne.com

8. Sprint asserts that the granting of its Petition to Intervene will not in any way delay the proceedings in this Docket.

WHEREFORE, Sprint prays for the Commission to:

- a. Grant this Petition to Intervene and make Petitioner a party of record in Docket No. 2012-54-C, allowing Petitioner to participate fully and take such positions as it deems advisable; and
- b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

ELLIS, LAWHORNE & SIMS, P.A.

BY: s / John J. Pringle, Jr.
John J. Pringle, Jr., Esquire
Post Office Box 2285
Columbia, SC 29202
(803) 343-1270
jpringle@ellislawhorne.com
Attorneys for Sprint Communications
Company, L.P.

March 13, 2012
Columbia, South Carolina

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2012-54-C**

IN RE:

Petition of Verizon Communications,)	
Incorporated Requesting That the)	
Commission Require Frontier)	
Communications of the Carolinas,)	
Incorporated to Modify Its Tariff to)	CERTIFICATE OF SERVICE
Correctly Reflect Application of Its)	
Interstate Switched Access Rates to)	
Originating, as well as Terminating,)	
VoIP-PSTN Access Minutes)	

This is to certify that I have caused to be served this day, the **Petition to Intervene** filed by Sprint Communications Company, L.P., by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

VIA FIRST CLASS AND ELECTRONIC MAIL SERVICE

John M.S. Hoefer, Esq.
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC, 29202
jhoefer@willoughbyhoefer.com

VIA FIRST CLASS AND ELECTRONIC MAIL SERVICE

Steven W. Hamm, Esq.
Richardson Plowden and Robinson, P.A.
Post Office Drawer 7788
Columbia, SC, 29202
shamm@richardsonplowden.com

VIA FIRST CLASS AND ELECTRONIC MAIL SERVICE

Nanette S. Edwards, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC, 29201
nsedwar@regstaff.sc.gov

s/ Carol Roof
Carol Roof
Paralegal

March 13, 2012
Columbia, South Carolina